

## **TASK ORDER 24**

This Task Order pertains to an Agreement by and between the City of Grand Island, NE (City), (“OWNER”), and HDR Engineering, Inc. (HDR), (“ENGINEER”), per the January 5, 2018 Master Services, (“the Agreement”). Engineer shall perform services on the project described below as provided herein and in the Agreement. This Task Order shall not be binding until an Approved Firm Purchase Order has been signed by the OWNER and approved by the ENGINEER. Upon execution, this Task Order shall supplement the Firm Purchase Order as it pertains to the project described below. The Task Order will be stated on the Firm Purchase Order.

TASK ORDER NUMBER: **24**

PROJECT NAME: **PGS Ash Landfill Title 132 Permit Renewal**

### **PART 1.0 PROJECT DESCRIPTION:**

The City owns and operates an existing fossil fuel combustion ash disposal area at their Platte Generating Station (PGS). This ash monofill known as the PGS Ash Landfill is permitted with the state of Nebraska (Facility ID 58027, Permit No. NE0203831). The current PGS Ash Landfill Title 132 permit expires August 15, 2025. The Nebraska Department of Environment and Energy (NDEE) begins the permit renewal process at least ten months prior to the expiration date of the permit.

This Scope of Services provides engineering services to assist the City during the NDEE permit meeting and inspection, NDEE comments, operational updates, and revisions to the Title 132 permit renewal application. HDR will utilize the previous permit renewal documents developed during 2019 and 2020 to streamline the efforts during this permit renewal process.

### **PART 2.0 SCOPE OF SERVICES TO BE PERFORMED BY ENGINEER ON THE PROJECT:**

Services to be performed by HDR will include the following tasks.

#### **Task 24-100 – NDEE Title 132 Permit Renewal Application**

**Objective:** To prepare the permit renewal application with modifications to the existing Title 132 permit for the PGS Ash Landfill for submittal to NDEE. The permit renewal will incorporate updated plans required by the Environmental Protection Agency’s (EPA) final rule for the regulation and management of coal combustion residuals (CCR Rule) under Subtitle D of the Resource Conservation and Recovery Act (RCRA).

#### **HDR Activities:**

1. Attend the on-site comprehensive permit inspection and site review with City and NDEE staff. Review NDEE pre-inspection comment letter and previous comments. HDR will also review the existing permit documents and NDEE’s special conditions.
2. Utilizing the 2019/2020 permit renewal documents, revise and update the permit renewal application:
  - Volume I Operations Summary: Revise for current regulations (Title 132 and CCR Rule), update CCR generation and beneficial reuse quantities, survey volumes, acceptable wastes, and revise summaries on financial assurance, stormwater management, and groundwater monitoring that reflect changes in the appendices. Revise site life, quantities and volumes based on 2024 survey, actual data and ash projections. City to further review and revise operational criteria text to conform to current and planned operations.
  - Appendix A – Run-on and Run-off Control System Plan: Review the current plan and discuss monitoring and inspection activities with the City. Update the plan for changes in monitoring and installed structures. Add NDEE letter and copy of most recent site NPDES notice of intent (prepared by others).

- Appendix B – CCR Fugitive Dust Control Plan: Review and update the plan for changes to ash management practices potentially impacting CCR fugitive dust. Revise figures for current management. Certify the amended CCR Fugitive Dust Control Plan.
  - Appendix C – Groundwater Sampling and Analysis Plan, or SAP: Review the 2021 SAP and remedial action plan and update the SAP for Title 132 amendments and CCR rule amendments. Prepare current site map with groundwater monitoring wells.
  - Appendix D – Closure Plan: Review and update the Closure Plan for coordination with CCR Rule and Title 132. Certify the amended Closure Plan.
  - Appendix E – Post-Closure Plan: Review and update the Post-Closure Plan. Coordinate with updated Closure Plan and SAP. Certify the amended Post-Closure Plan.
  - Appendix F – Financial Assurance: Update the closure and post-closure cost estimates. Incorporate copy of City's 2024 financial assurance report with financial assurance mechanism.
  - Appendix G – Construction Quality Assurance Plan: Review and update this plan and coordinate with revised Closure Plan.
  - Appendix H – Permit Drawings: Revise and reissue the four (4) Permit Drawings to incorporate the most recent topographic survey into the plan drawings and cross-sections. Identify the current elevations of the ash on the cross-sections.
3. Incorporate the Volume II appendices containing existing historic documents and calculations for unstable areas determination, hydrogeological reports, locational criteria and maps, design criteria figures, and soil erosion calculations.
  4. HDR will complete calculations and analyses for permit renewal application as identified below:
    - Update estimates of remaining life of overall site based on recent survey, volumes in place, projected ash generation quantities, beneficial reuse volumes, and final closure contours.
    - Update closure and post-closure cost estimates to 2024 unit prices, estimate repair and maintenance in post-closure, coordinate groundwater monitoring costs with revised SAP. Provide engineer's letter and updated cost estimates to City for their 2025 financial assurance report. Insert copy of most recent financial assurance method (provided by the City).
  5. Prepare Draft permit renewal application (documents and drawings) and electronically submit to City for review. HDR will conduct a conference call and desktop share meeting to review the Draft permit renewal application and address City's questions and comments.
  6. Finalize permit renewal application, prepare transmittal letter and submit to NDEE on behalf of the City.
  7. Prepare the NDEE form for Application for Fossil Fuel Combustion Ash Disposal Area for City to sign and forward to the NDEE.
  8. Compile the final permit documents and place in OneDrive folder or SharePoint site for the City after all NDEE comments have been addressed (under Task 24-200). Identify for the City which plans required to be posted on the publicly available CCR website.
  9. Incorporate groundwater compliance information as it becomes available for compliance with NDEE Title 132 and federal CCR Rule requirements.

**Task Deliverables:**

- Draft Title 132 Permit Renewal application documents and drawings, submitted electronically.
- Final Title 132 Permit Renewal application (NDEE – electronic submittal & 2 hard copies, City – 1 hard copy & 1 electronic copy).
- Letter of transmittal of permit documents.
- List of plans required that City place on their publicly available CCR website.

**Planned Meetings:**

1. One meeting at Grand Island Platte Generating Station attended by two HDR professionals for comprehensive site review with City and NDEE staff.
2. Conference call review meeting with City to discuss draft permit revisions and comments.

**Key Understandings:**

1. HDR has PDFs provided by the City of historic information which will be incorporated into Volume II of the permit renewal application. HDR assumes no further changes to this information.
2. City will provide any NDEE communications on the PGS Ash Landfill received since August 2020. City will also provide any permit plans revised by City or Others since 2020 in their original file format of Microsoft Word and Excel. CCR generation and reuse data should be provided in Excel spreadsheet.
3. Topographic survey of the PGS Ash Landfill will be completed by the City and electronic files (AutoCAD or xml) provided to HDR by November 1, 2024 in order to update the permit drawings. No additional surveying will be undertaken by HDR.
4. No changes to the final closure contours provided in the existing Title 132 permit.
5. Data provided by the City as detailed in Part 3.0 Owner’s Responsibilities.
6. HDR will provide Draft and Final permit renewal application documents and drawings in electronic format (PDFs). Transfers of large files or drawings are anticipated to be accomplished through e-mail, OneDrive or other electronic transfer means.
7. City will provide a single set of non-conflicting comments on deliverables within 10 business days.
8. The 2025 financial assurance report will be completed by the City. HDR will provide City the updated closure and post-closure cost estimates and engineer’s letter for incorporation into the report. City will select the financial assurance mechanism and provide all other financial assurance documentation required by selected mechanism.
9. City will pay the permit renewal or permit modification fee to NDEE and submit signed form.
10. No additional meetings beyond those identified above are planned. Additional communications with NDEE and the City will be conducted via telephone, e-mail, or mail.
11. HDR will respond to NDEE comments on permit renewal application under Task 24-200.
12. HDR will incorporate groundwater compliance documents, such as alternate source demonstration and assessments available at the time of submittals, into this permit. No groundwater compliance work is associated with this scope.

**Anticipated Task Schedule:**

Anticipated Notice to Proceed	October 2024
NDEE Comprehensive Site Inspection*	October 2024
Draft Title 132 Permit Renewal to City	early December 2024
Review Call with City	December 2024
Final Title 132 Permit Submitted to NDEE*	January 2025

\*Current anticipated NDEE review timeline; timeline may vary from this anticipated schedule.

**Task 24-200 – Respond to NDEE Comments**

**Objective:** To address comments and revisions required by NDEE on the PGS Ash Landfill permit renewal application submitted under Task 24-100.

**HDR Activities:**

1. Review NDEE comments and discuss approach with City. Previous experience with NDEE on permit renewals have shown that NDEE comments on the submittal may be different and additional to the comments made during the comprehensive review visit. If previously unidentified comments are received, HDR will discuss them with the City and contact NDEE with questions and approach.
2. Prepare permit renewal application revisions based on NDEE comments received after the initial submittal.
3. Provide draft of revised permit renewal application pages and/or drawings affected by NDEE requested permit revisions/clarifications to City for review. Draft review comments will be handled via telephone call and/or e-mail.

4. Incorporate City's review comments and final revisions into the revised permit application. Provide only the revised pages and/or drawings to the Title 132 Permit Renewal Application for the PGS Ash Landfill.
5. Prepare a response transmittal letter and submit the revised permit pages and updates to NDEE on behalf of City.

**Task Deliverables:**

- Draft individual permit application pages and drawings that are affected by NDEE's comments transmitted electronically for City review.
- Final revised permit replacement pages and/or drawings (NDEE – electronic submittal & 2 hard copies; City – 1 hard copy, 1 electronic copy).
- Response Letter to NDEE and transmitting of revised permit documents.

**Planned Meetings:** None. Communications via telephone and e-mail.

**Key Understandings:**

1. NDEE comments will not substantially change the permit application.
2. Public notice of the permit renewal may lead to NDEE holding a public hearing. If a public hearing is scheduled, HDR can attend and provide City assistance upon approval of additional services.
3. An allowance of \$5,700 has been included to address NDEE's potential comments. If efforts to respond to NDEE comments exceed this allowance, activity will be defined in Additional Services. Similarly, if efforts to respond to NDEE comments do not utilize the entire allowance, fee will only be invoiced for the required services.
4. The individual changed pages will be transmitted electronically to the City for review.
5. Provide copies of only revised pages and drawings to the Title 132 Permit Renewal Application.

**Anticipated Task Schedule:**

NDEE Review Comments*	February 2025
Responses Submittal*	February/March 2025
NDEE Public Notice*	March 2025

\*Current anticipated NDEE review timeline; timeline may vary from this anticipated schedule.

**Additional Services**

Possible additional services may include additional communications or meetings with NDEE, permit public hearing/meeting, additional site visits, or other requested services by the City related to the PGS Ash Landfill and Title 132 permit.

**PART 3.0 OWNER'S RESPONSIBILITIES:**

1. City to complete a topographic survey of the PGS Ash Landfill and provide the electronic files (AutoCAD or xml) to HDR before November 1, 2024. City to provide most recent Station site survey that should show access roads from the power plant to the PGS Ash Landfill and any constructed facility structures, culverts, fencing, stormwater structures, etc. on and surrounding the PGS Ash Landfill.
2. City will provide HDR with the following information:
  - Annual ash quantities generated and placed in PGS Ash Landfill during 2024 (breakdown of bottom ash, scrubber ash and fly ash) and through 2024 survey date; and if available, volume consumed to that date.
  - Annual ash quantities removed from the PGS Ash Landfill through beneficial use during 2024 and through 2024 survey date.
  - Coal combustion projections for the power plant and any ash generation projections and beneficial reuse estimates.
  - Copy of NDEE approval letter for the 2024 financial assurance and City's financial assurance report.

- Copy of most recent site NPDES permit notice of intent and NDEE approval letter – identify surface monitoring requirements at the PGS Ash Landfill.
  - Dates, pump capacity and times of pumping stormwater run-off from the landfill.
  - Most recent detailed cost information available regarding site construction and operation activities to update the closure and post-closure cost estimates, including unit prices on soils (material, haul, placement), vegetation (seeding, fertilizer, mulching), stormwater structures, inspections, current annual maintenance and surface water monitoring.
3. City has previously provided PDF files of the Title 132 permit and single Microsoft Word file. City will provide requested drawings (AutoCAD format), electronic files and data related to the PGS Ash Landfill.
  4. City will further describe the changes made to management of bottom ash and any changes in handling and management of scrubber ash, lime slurry and stormwater run-off.
  5. City will provide prompt review and comments on the revised permit renewal application documents.
  6. City will pay the NDEE fee for the Title 132 permit renewal or major modification.
  7. City will place any revised and amended CCR Rule required plans in their operating record, post it to their CCR website, and notify the NDEE of such placements.

**PART 4.0 PERIODS OF SERVICE:**

Services associated with this project will commence upon Notice to Proceed from the City of Grand Island anticipated October 2024 and continue through conclusion of NDEE’s public notice period anticipated April/May 2025. The schedule for each task is outlined within the tasks above.

**PART 5.0 PAYMENTS TO ENGINEER:**

Compensation for these Services shall be on a per diem basis with an agreed maximum amount of Thirty-Seven Thousand Six Hundred Thirty dollars (\$37,630.00) without additional City authorization. The following table contains a breakdown of the estimated fee by task for this project.

<b>Task Description</b>		<b>Estimated Total Fee</b>
Task 24-100	NDEE Title 132 Permit Renewal Application	\$31,930
Task 24-200	Respond to NDEE Comments (Allowance)	\$5,700
<b>TOTALS</b>		<b>\$37,630</b>

Per Diem shall mean an hourly rate equal to Direct Labor Cost times a multiplier of 3.20 to be paid as total compensation for each hour an employee works on the project, plus Reimbursable Expense.

Direct Labor Cost shall mean salaries and wages, (basic and overtime) paid to all personnel engaged directly on the Project.

Reimbursable Expense shall mean the actual expenses incurred directly or indirectly in connection with the Project for transportation travel, meals, equipment rental and field supplies, subconsultants, subcontractors, telephone, telex, shipping and express, and other incurred expenses.

HDR will add five percent (5%) to invoices received by HDR from subconsultants and subcontractors to cover supervision, administrative, and insurance expenses. No subconsultants are planned under this Task Order 24.

This Task Order is executed this 24<sup>th</sup> day of October, 2024.

CITY OF GRAND ISLAND, NE

HDR ENGINEERING, INC.

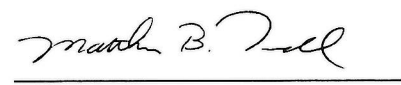
"OWNER"

"ENGINEER"

BY:



BY:



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